

Leep Networks Water Limited



Pollution Incident Reduction Plan

March 2026



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CEO Foreword

As Chief Executive of Leep Networks Water Ltd (LNWL), I am personally committed to ensuring that our operations protect the environment and comply fully with our statutory obligations. The Pollution Incident Reduction Plan (PIRP) published here has been prepared in accordance with the requirements introduced by the Water (Special Measures) Act 2025, which mandates that all relevant undertakers, including NAVs, to publish an annual PIRP from 1 April 2026.

In the most recent reporting year, our company recorded zero pollution incidents attributable to our network. The only relevant historical event dates back to 2022, involving a single discharge. Following investigation by the Environment Agency, no fault was assigned to LNWL. We received a formal warning and covered the associated investigation costs, with no enforcement action or prosecution taken.

Even though the incident was not proven to be caused by our assets, we took the opportunity to strengthen our internal procedures, improve our evidence-gathering processes and reinforce preventative measures to reduce the already very low risk of pollution.

This PIRP sets out:

1. The measures currently in place to prevent pollution incidents;
2. Our review of any relevant incidents in the previous year;
3. Our plan to further reduce the risk of pollution incidents over the next calendar year; and
4. The governance arrangements that ensure transparency, accountability and compliance.

I confirm that I have:

- Reviewed this plan in full;
- Ensured that it accurately reflects our operations, risk profile and controls; and
- Taken all reasonable steps and exercised all due diligence to ensure compliance with our statutory duties under sections 205A–205C of the Water Industry Act 1991.

I approve the publication of this plan and affirm Leep Utilities' commitment to maintaining high environmental standards and continuous improvement in pollution prevention.



Chief Executive Officer
Leep Networks Water Ltd

1.Introduction

This Pollution Incident Reduction Plan (PIRP) has been prepared by Leep Networks Water Ltd (LNWL) in accordance with sections 205A–205C of the Water Industry Act 1991 and the statutory guidance published by the UK Government, the Environment Agency and Natural Resources Wales in January 2026.

LNWL operates as a New Appointments and Variations (NAV) water and sewerage undertaker. The company is an adoption-based business and does not design or construct new water or wastewater networks. Assets are adopted following construction by third-party developers in accordance with the relevant adoption agreements and standards.

LNWL operates predominantly modern, recently constructed networks and has not experienced any pollution incidents since 2022. The company therefore applies the PIRP requirements proportionately, reflecting its limited operational footprint, asset base and risk profile, while maintaining full compliance with statutory obligations.

This PIRP sets out:

- the measures currently in place to prevent pollution incidents;
- a review of relevant historic incidents, where applicable;
- the actions LNWL will take to further reduce the risk of pollution incidents; and
- the governance and assurance arrangements that support transparency and accountability.

The plan will be reviewed annually and published in accordance with statutory requirements.

2. Pollution Incident Review (Previous Calendar Year)

2.1 Recorded Incidents

No pollution incidents were recorded during the most recent calendar year.

LNWL has not experienced any pollution incidents since 2022.

2.2 Historic Incidents

A single discharge event occurred in 2022. The Environment Agency investigated the incident and advised it believed an offence may have occurred under Regulations 12 and 38 of the Environmental Permitting (England and Wales) Regulations 2016, relating to the management of the initial incident response.

No further enforcement action was taken beyond the issue of a warning letter.

2.3 Lessons Learned

Following the 2022 incident, LNWL undertook a review of its incident response and operational controls. As a result, the company enhanced:

- incident response procedures;
- internal escalation and reporting arrangements;
- evidence capture and record-keeping;
- contractor performance and oversight; and
- implementation of The Wastewater Blockage Response and Investigation Policy.

These measures have strengthened LNWL's preparedness and contributed to the absence of pollution incidents since 2022.

3. Current Measures to Prevent Pollution

LNWL's approach to pollution prevention reflects its role as an adoption-based NAV water and sewerage undertaker. The company does not design or construct new networks; instead, pollution prevention is focused on robust adoption processes, effective operational oversight and incident preparedness.

Adoption and Asset Acceptance

All water and wastewater assets are adopted following construction by third-party developers in accordance with the relevant adoption agreements and technical standards. Assets are subject to inspection and acceptance checks prior to adoption to ensure they meet required specifications and are suitable for operation.

Asset Inspection and Maintenance

LNWL operates predominantly modern networks and applies a risk-based approach to inspection and maintenance. Routine inspections and targeted checks are undertaken to identify defects, blockages or operational issues that could give rise to pollution incidents.

Operational Controls and Contractor Management

Operational activities are supported by documented procedures and oversight arrangements. Where contractors are used, LNWL applies defined requirements for competency, supervision and escalation to ensure works are carried out safely and in accordance with the required standards.

Incident Response Preparedness

LNWL maintains an Incident Management Policy and supporting escalation procedures. These set out clear roles, responsibilities and communication pathways to ensure prompt response, effective mitigation and timely notification to relevant regulators where required.

Competence, Training and Awareness

Employees and contractors involved in operational activities receive appropriate training and guidance to ensure awareness of pollution risks, reporting requirements and incident response expectations.

4. How We Will Reduce Pollution Incidents Next Year

In accordance with statutory guidance, LNWL has identified proportionate forward-looking actions to further reduce the already low risk of pollution incidents. These actions are focused on maintaining effective controls, strengthening preparedness and ensuring continued compliance as the business and asset base evolves.

Planned actions for the next calendar year include:

- periodic review of high-risk adopted assets to confirm continued operational integrity;
- refresher training and awareness activities for staff and contractors involved in incident management
- continued testing of incident escalation and communication arrangements through scenario-based exercises;
- review and refinement of evidence capture and record-keeping processes to support effective incident management; and
- ongoing review of contractor performance and compliance with LNWL operational requirements.

These measures build on existing controls and reflect LNWL's role as an adoption-based NAV operating a modern, low-risk network. They are intended to maintain strong performance and ensure continued readiness to respond effectively should an incident occur.

5. Forecast of Pollution Incident Risk

Based on LNWL's recent performance, the modern nature of its adopted asset base and the controls described in this plan, the risk of pollution incidents remains low.

LNWL will continue to monitor performance and review its controls to ensure risks are identified and managed effectively as the business and asset base evolves.

Performance against this plan will be reported through the statutory implementation reporting process from 2027, in accordance with legislative requirements.

6. Governance, Accountability and Assurance

LNWL's governance and assurance arrangements are aligned with the requirements of sections 205A–205C of the Water Industry Act 1991 and the statutory guidance published in January 2026.

Overall accountability for pollution incident performance and compliance with statutory duties sits with the Board of Directors, with executive responsibility held by the Chief Executive Officer. The Chief Executive Officer has reviewed and approved this Pollution Incident Reduction Plan and is satisfied that it accurately reflects LNWL's operations, risk profile and control environment.

The PIRP is supported by LNWL's established policies and procedures for incident management, escalation and regulatory reporting. These arrangements are designed to ensure prompt response to incidents, effective mitigation and timely engagement with regulators where required.

This plan will be reviewed annually and updated as necessary to reflect changes to LNWL's operations, asset base or regulatory requirements. The PIRP will be published by 1 April 2026, in accordance with statutory obligations.

7. Continuous Improvement

LNWL is committed to continuous improvement in pollution prevention through the ongoing review of risks, controls and incident preparedness arrangements.

The company will use operational experience, assurance activity and any relevant regulatory feedback to refine its procedures, training and response arrangements over time. This approach ensures that controls remain effective and proportionate as LNWL's asset base and operations evolves.

Table 1. Frequency and seriousness of pollution incidents across all asset types during 2025

Month	Category 1 Pollution Incidents	Category 2 Pollution Incidents	Category 3 Pollution Incidents
January	0	0	0
February	0	0	0
March	0	0	0
April	0	0	0
May	0	0	0
June	0	0	0
July	0	0	0
August	0	0	0
September	0	0	0
October	0	0	0
November	0	0	0
December	0	0	0

Table 2. Cause of serious pollution incidents across all asset types during 2025

Nil return. LNWL did not experience any Category 1 or Category 2 pollution incidents during the preceding calendar year.

Event Number	Reported Date & Time	Location	Seriousness	Root Cause
Exxxx	DD-MM-YYY, HH:mm	Insert location	Category 1 or 2	List root causes

Table 3. Causes of Category 3 pollution incidents across all asset types during 2025

Nil return. LNWL did not experience any Category 3 pollution incidents during the preceding calendar year.

Insert % figure for each root cause

Root Cause	Number of Category 3 pollution incidents	Proportion of Category 3 pollution incidents (%)

Table 4. Measures taken to maintain all asset types in 2025

Asset	Measure	Description of Actions	Scale of Actions	Impact of the measure (Category 1-2 incidents prevented)	Root cause(s) addressed by the measure	Recent pollution incident performance issues identified in DWMP	Delivery Status of the measure
Wastewater networks	Adoption inspection and asset acceptance	Inspection and verification of wastewater assets prior to adoption to ensure compliance with adoption agreements and suitability for operation	All assets adopted during the year	Maintains low risk of pollution incidents	Construction defects; poor asset condition at handover	Not applicable	Ongoing
Wastewater networks	Risk based asset inspections	Routine and targeted inspections of adopted assets to identify defects, blockages or operational issues	Risk-based; targeted where required	Maintains low risk of pollution incidents	Asset deterioration; operational failures	Not applicable	Ongoing
All asset types	Incident response arrangements	Maintenance of incident response procedures, escalation pathways and regulatory notification arrangements	Applies to all operational activities	Enables prompt response and mitigation	Delayed response; unclear escalation	Not applicable	Ongoing
All asset types	Contractor management and oversight	Defined competency, supervision and escalation requirements for contractors undertaking operational activities	Applies to all relevant contractors	Maintains low risk of pollution incidents	Poor contractor practices	Not applicable	Ongoing
Pumping stations	Adoption inspection and operational readiness	Inspection and verification of pumping stations prior to adoption, including confirmation of operational readiness, alarm arrangements and suitability for operation. Ongoing planned preventative maintenance and inspection	All pumping stations adopted during the year. Quarterly Maintenance.	Maintains low risk of pollution incidents	Mechanical or electrical failure; inadequate handover	Not applicable	Ongoing

Pumping stations	Monitoring (where installed) and incident response arrangements	Use of alarms, monitoring and defined escalation procedures to support timely response to pumping station faults or failures	Applies to all adopted pumping stations	Enables prompt response and mitigation	Delayed response to asset failure	Not applicable	Ongoing
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Table 5. Planned additional measures for all asset types in 2026

Asset	Additional Measures	Scales of actions in the next calendar year	Expected impact of the measure in the net calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in our DWMP	Implementation start date	Implementation complete date of the measure
All asset types	Review of incident response arrangements	Periodic review of incident response procedures, escalation pathways and contact arrangements	Maintains low risk of pollution incidents	Delayed or ineffective incident response	Not applicable	2026	Ongoing
All asset types	Refresher training and awareness	Refresher training and awareness activities for employees and contractors involved in incident response	Maintains low risk of pollution incidents	Lack of awareness of reporting and response requirements	Not applicable	2026	Ongoing
Pumping stations	Review of adopted pumping station readiness	Targeted review of adopted pumping stations to confirm continued operational readiness and effectiveness of response arrangements	Maintains low risk of pollution incidents	Mechanical or electrical failure; delayed response	Not applicable	2026	Ongoing
All asset types	Customer Communication Campaign	General and targeted customer blockage prevention communication	Number of Category 1, 2 and 3 incidents prevented	Poor customer awareness of proper sewer use	Pollution incident performance issues addressed by the measure	2026	

Table 6. Success or failure in implementing the measures planned in 2025 for all asset types

Asset	Measures	Description of action(s)	Scale of action(s)	Planned Implementation start date of the measure	Planned implementation on completion date of the measure	Extent of implementation planned or achieved at the end of previous calendar year	Position of implementation at the end of previous calendar year	Explanation	How to avoid repeated failure
All asset types	Not applicable	No additional pollution incident reduction measures were planned in the preceding calendar year beyond established controls	Not applicable	Not applicable	Not applicable	Not applicable	Completed (business as usual)	No pollution incidents occurred	Not applicable